

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THERON BRADLEY, and TOMMY)	
JENKINS on behalf of themselves and)	
similarly situated individuals,)	
)	
Plaintiffs,)	Case No. 16 - CV 10259
)	
v.)	Magistrate Judge Young B. Kim
)	
SILVERSTAR, LTD, GOLD)	
STANDARD TRANSPORTATION, INC.,)	
and AMAZON.COM, LLC,)	
)	
Defendants.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL
APPROVAL OF THE PARTIES' STIPULATION OF SETTLEMENT**

Now come Theron Bradley and Tommie Jenkins (“Named Plaintiffs”) on behalf of themselves and all others similarly situated, and move this Court for Final Approval of the Parties’ Settlement. In support of his Unopposed Motion for Final Approval, Plaintiff states as follows:

1. On December 21, 2017, this Court granted Preliminary Approval to the Parties’ Ninety-Four Thousand Two Hundred Ninety-Four Dollars and No Cents (\$94,294.00) settlement of Plaintiff’s claims on behalf of himself and a class of other similarly situated employees of Defendant Silverstar, Ltd., for claims alleging they were not paid overtime wages for all time worked in excess of forty hours per week in violation of the Fair Labor Standards Act, 29 U.S.C. §201, *et seq.* (“FLSA”), and the Illinois Minimum Wage Law, 820 ILCS 105/1, *et seq.* (“IMWL”).

2. Final approval is appropriate where the court determines that a settlement is fair,

adequate, and reasonable. *Synfuel Techs., Inc. v. DHL Express (USA), Inc.*, 463 F.3d 646, 652 (7th Cir. 2005). In determining whether a settlement is fair, adequate, and reasonable, courts in the Seventh Circuit consider a variety of factors including:

- a. the strength of plaintiffs' case, weighed against the settlement offer;
- b. the complexity, length, and expense of further litigation;
- c. the presence of collusion between the parties;
- d. the opinion of competent counsel;
- e. the reaction of class members to the proposal; and
- f. the stage of proceedings and discovery completed.

In re Mexico Money Transfer Litig., 164 F. Supp. 2d 1002, 1014 (N.D. Ill. 2000) (citing *Donovan v. Estate of Fitzsimmons*, 778 F.2d 298, 308 (7th Cir. 1985)). As explained in detail in Plaintiffs' supporting memorandum of law, the Parties' Stipulation of Settlement here meets these factors and should be approved.

WHEREFORE, Plaintiffs respectfully request that the Court enter a Final Order approving the Parties' Stipulation of Settlement in the form attached to Plaintiffs' accompanying Memorandum as Exhibit A.

Respectfully Submitted,

Dated: April 12, 2018

s/Alvar Ayala
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